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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LAS VEGAS SKYDIVING
16 ADVENTURES, LLC, a Nevada limited-
17 liability company;

18 Plaintiff,

19 v.

20 GROUPON, INC., a Delaware
21 corporation; DOES I through X,
22 inclusive; ROE CORPORATION I,

23 Defendants.

24 Case No.: 2:22-cv-00047-RFB-BNW

25 **STIPULATION AND [PROPOSED]
26 ORDER TO EXTEND TIME FOR
GROUPON, INC. TO FILE RESPONSE
TO COMPLAINT**

27 **[FIRST REQUEST]**

28 Plaintiff Las Vegas Skydiving Adventure, LLC, and Defendant Groupon, Inc. (“Groupon”) by and through their respective counsel of record, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree to extend the deadline for Groupon’s response to the Complaint in this action (currently due on February 2, 2022) by three (3) weeks, through and including **February 23, 2022**, and request that the Court enter an order approving the same. This extension is requested so that Groupon, Inc. may fully investigate the Complaint, and due to schedule conflicts of counsel. This request is not for purposes of delay.

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1 Should Groupon's response to the Complaint include a motion under Fed. R. Civ. P. 12,
2 the parties further stipulate and agree to extend the deadline for Plaintiff's response to such
3 motion by three (3) weeks beyond the standard opposition deadline outlined in Local Rule 7-2.

4 **IT IS SO STIPULATED.**

5 DATED this 19th day of January, 2022.

6 **GIBSON LEXBURY LLP**

7 /s/ Roman Nikhman

8 STEVEN A. GIBSON
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Counsel for Plaintiff Las Vegas Skydiving Adventures, LLC

5 DATED this 19th day of January, 2022.

6 **GREENBERG TRAURIG, LLP**

7 /s/ Tyler R. Andrews

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21 **ORDER**

22 IT IS ORDERED that ECF No. 5 is GRANTED in part and
23 DENIED in part. It is granted to the extent that Groupon's
24 deadline to respond to the complaint is extended. It is
denied without prejudice to the extent the parties seek to
extend Plaintiff's response deadline to a potential motion to
dismiss, as this stipulation must be filed as a separate
request. See LR IC 2-2(b).

26 IT IS SO ORDERED
27 DATED: 3:25 pm, January 20, 2022

28 
BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

1 CERTIFICATE OF SERVICE

2 Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 19th day of January, 2022, a
3 true and correct copy of the foregoing ***Stipulation and [Proposed] Order to Extend Time for***
4 ***Groupon, Inc. to File Response to Complaint [First Request]*** was filed electronically via the
5 Court's CM/ECF system. Notice of filing will be served on all parties by operation of the
6 Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

7
8 */s/ Andrea Lee Rosehill*

9 An employee of GREENBERG TRAURIG, LLP